

BOOKED FOR FILING

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of

Advanced Television Systems  
And Their Impact upon the  
Existing Television Broadcast  
Service

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MB Docket No. 87-268

**FILED/ACCEPTED**

To the Commission

**DEC 21 2006**

Federal Communications Commission  
Office of the Secretary

**Comments of  
Piedmont Television of Monroe/El Dorado License LLC**

Piedmont Television of Monroe/El Dorado License LLC ("Piedmont"), the permittee of digital television station KTVE-DT, Channel 27, El Dorado, Arkansas (Facility ID No. 35692) (the "Station"), by its attorneys, hereby submits these comments in response to the Seventh Further Notice of Proposed Rulemaking (the "Seventh FNPR") in the above-referenced proceeding. In the Seventh FNPR, the Commission proposed a new DTV Table of Allotments, providing eligible stations with channels for DTV operations after the DTV transition and specifying certain technical parameters for each station's DTV operations. Although Piedmont does not challenge the Commission general approach to developing the proposed DTV Table of Allotments, Piedmont nevertheless requests that the Table of Allotments be amended to reflect the technical specifications provided in the construction permit the Commission previously issued for the construction of the DTV facilities of the Station (*see* FCC File No. BPCDT-19991101ALF).

In preparing the DTV Table of Allotments, the Commission relied on the certifications made by the DTV licensees, along with computer analysis and the technical

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standards and methods set forth in the Commission's rules.<sup>1</sup> Among other things, the specifications for the Station set forth at Appendix B to the Seventh FNPR assume (1) Piedmont's certification of "replication" facilities and (2) use of a top-mounted antenna. Accordingly, Appendix B to the Seventh FNPR set forth the following specifications for the Station's DTV operations:

KTVE-DT (per proposed Table of Allotments)

DTV Channel:	27
ERP:	734 kW
HAAT:	605 m
Antenna ID:	74801
Latitude:	33-04-41.0 N
Longitude:	092-13-41.0 W
Area:	43,603
Population:	631,000
Interference Received:	5.5%

Although Piedmont previously certified that it would construct "replication" facilities (and still proposes to do so), in applying for a construction permit for the Station, Piedmont proposed the use of a side-mounted antenna. The use of a side-mounted antenna for the Station's DTV operations is far more cost-effective and efficient than a top-mounted antenna because the Station's analog signal currently is being transmitted via a top-mounted antenna on the same tower. When the DTV transition is complete, the Station can simply stop using the top-mounted analog antenna, and continue to operate with the side-mounted DTV antenna, rather than wasting time, effort and resources replacing the top-mounted analog antenna with a top-mounted DTV antenna.

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<sup>1</sup> Seventh FNPR ¶¶18-22.

As demonstrated in the attached Technical Narrative, the contour coverage area and population produced by the facilities specified in the Station's construction permit are virtually identical to those proposed by the facilities specified in Appendix B to the Seventh FNPR.<sup>2</sup> This is to be expected, as both were specifically designed to produce the "replication" facilities in accordance with Piedmont's prior certification.

The use of a side-mounted antenna, however, slightly decreased the height of the antenna above average terrain (HAAT), which, in turn, required a slight increase in the Station's effective radiated power (ERP) to maintain replication facilities. As the Technical Narrative demonstrates, the proposed facilities comply with the Commission's rules and the Commission granted a construction permit with the following specifications on June 20, 2002.<sup>3</sup> With the facilities as authorized in the Station's construction permit, the proposed DTV Table of Allotment should reflect the following data:

KTVE-DT (per BPCDT-19991101ALF)<sup>4</sup>

DTV Channel:	27
ERP:	822.8 kW
HAAT:	582 m
Antenna Model:	ERI Model No. ATW25H3-HSO-27S
Latitude:	33-04-41.0 N
Longitude:	092-13-41.0 W
Area:	41,193
Population:	631,490
Interference Received:	5.0%

As noted above, the use of a side-mounted antenna for the Station's DTV operations as specified in the Station's construction permit will be far more cost-effective and efficient than the top-mounted antenna assumed in the proposed DTV Table of Allotments. Thus, the modification to the proposed DTV Table of Allotments described

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<sup>2</sup> See Technical Narrative of Craig S. Turner, attached hereto as Exhibit A.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

herein will serve the public interest by assisting in the timely and efficient transition to digital service. As the proposed change will not adversely impact the service area or population of the Station or create any impermissible interference to any other Station, Piedmont urges the Commission to modify the proposed DTV Table of Allotments as described herein.

Respectfully submitted,

PIEDMONT TELEVISION OF MONROE/  
EL DORADO LICENSE LLC

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**STATION KTVE-DT  
FCC FILE NO. BMPCDT-19991101ALF  
FACILITY ID 35692  
EL DORADO, ARKANSAS  
CH 27 822.8 kW 582 M HAAT**

**Technical Narrative**

This technical exhibit has been prepared in support of the comments of Piedmont Television of Monroe/El Dorado License LLC, regarding the DTV Table of Allotments, as specified in the Federal Communications Commission's Seventh Further Notice of Proposed Rule Making, released October 20, 2006, for KTVE-DT, operating on channel 27 at El Dorado, Arkansas (File No. BMPCDT 19991101ALF)

The instant comments propose a change to the aforementioned DTV Table of Allotments to reflect the effective radiated power and antenna height above average terrain as specified in the current construction permit on file for KTVE-DT. (File No. BMPCDT 19991101ALF)

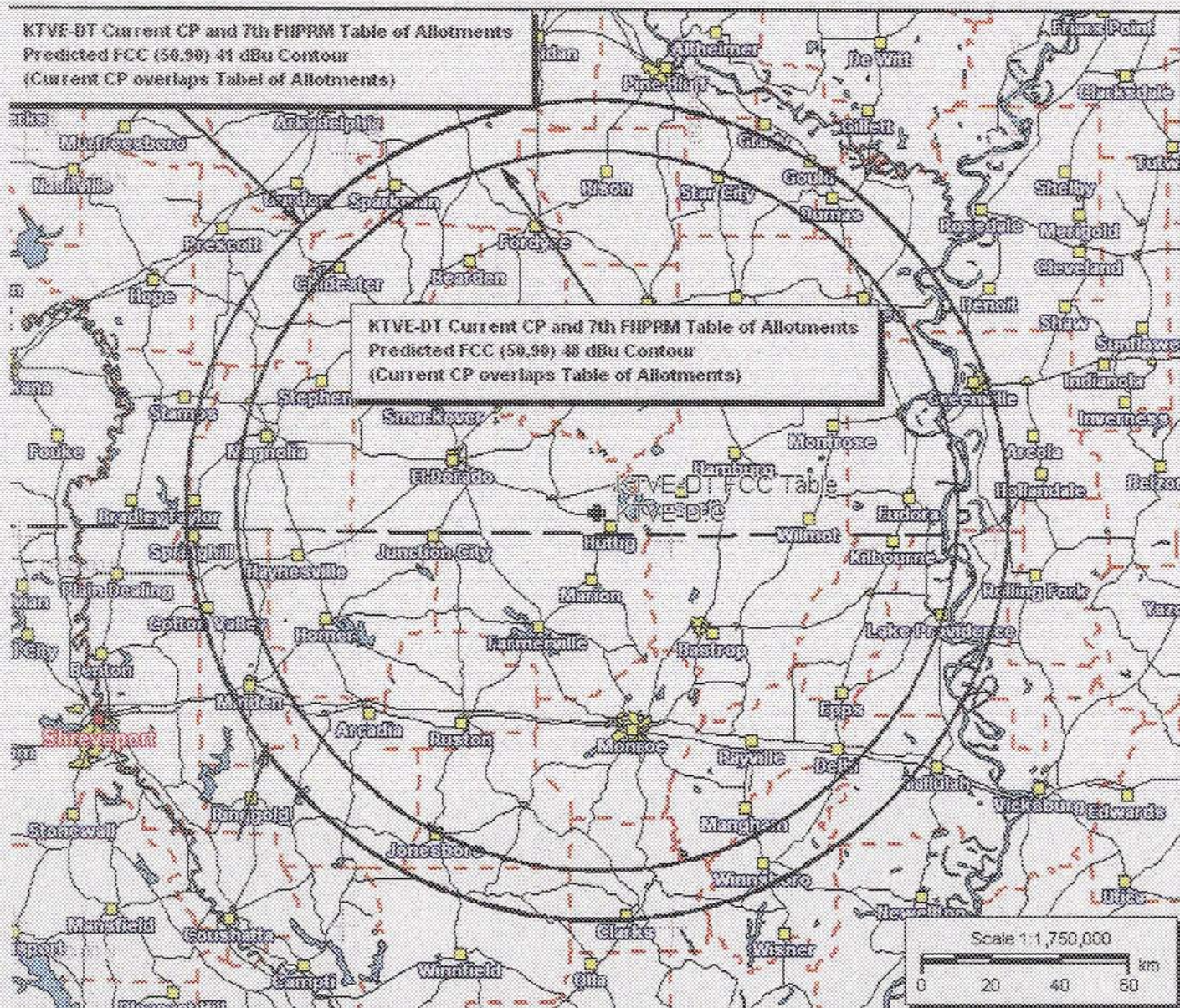
The technical facilities for KTVE-DT, as specified in Appendix B of the Seventh FNPRM (PROPOSED DTV TABLE OF ALLOTMENTS INFORMATION), show that the effective radiated power for KTVE-DT should be 734,000 watts and the antenna height above average terrain should be 605 meters. However, the current construction permit for KTVE-DT (File No. BMPCDT 19991101ALF) indicates that the effective radiated power (ERP) should be 822,800 watts and the antenna height above average terrain (HAAT) should be 582 meters. This equates to a reduction in antenna HAAT and an increase in ERP as referenced from the values in the Seventh FNPRM Table of Allotments.

These variances from the Seventh FNPRM Table of Allotments, as reflected in the KTVE-DT construction permit (File No. BMPCDT 19991101ALF), are due to the fact that the KTVE-DT antenna is to be "side mounted" on the tower instead of "top mounted" and thus the lower antenna HAAT. Furthermore, the increased KTVE-DT ERP compensates for the lower antenna placement to replicate, as certified, the overall land area coverage or the population coverage of KTVE-DT as demonstrated in the attached coverage map and population count. (exhibits A-1 and A-2 respectively).

Therefore, a request to modify the Proposed DTV Table of Allotments for KTVE-DT, El Dorado, Arkansas, as specified in Appendix B of the Seventh Further Notice of Proposed Rule Making, released October 20, 2006, is made to reflect a change of antenna HAAT from 605 meters to 582 meters and Effective Radiated Power from 734 kW to 822.8 kW.



# EXHIBIT A-1



KTVE-DT  
Coverage Map Showing  
Predicted FCC(50,90) 41 dBu contours  
and  
Predicted FCC(50,90) 48 dBu contours  
for  
The Current KTVE-DT Construction Permit (File No. BMPCDT 19991101ALF)  
and the  
FCC 7th FNPRM Table of Allotments

Note- CP Contours and Table of Allotment Contours Overlap Each Other



## EXHIBIT A-2

### North Carolina Broadcast Services, LLC Population Report

Population Database: 2000 US Census (SF1)

Primary Terrain: V-Soft 3 Second US Terrain

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#### Transmitter Information:

Call Letters: KTVE-DT - Current CP

File Number: BPCDT19991101ALF

Latitude: 33-04-41 N

Longitude: 092-13-41 W

ERP: 822.80 kW

Channel: 27

Frequency: 551.0 MHz

AMSL Height: 612.0 m

Elevation: 43.0 m

HAAT: 582.0 m

Horiz. Antenna Pattern: Omni

Vert. Elevation Pattern: Yes

Electrical Beam Tilt: 0.5

Propagation Model: Longley/Rice

Climate: Continental temperate

Conductivity: 0.0050

Dielectric Constant: 15.0

Refractivity: 100.0

Receiver Gain: 0 dB

Time Variability: 90.0%

Situation Variability: 50.0%

ITM Mode: Broadcast

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Population report for KTVE-D.C . Field strength above 41.00 db uV/m.

Total Population: 631,490 Total Housing Units: 270,937

Total Area covered by KTVE-D.C: 41192.80 sq. km

Total Area covered by KTVE-D.C where population exists: 21401.94 sq. km

#### Breakdown:

White:	380,738	( 60.3% )
Black:	233,815	( 37.0% )
Hispanic:	8,955	( 1.4% )
Native American:	1,292	( 0.2% )
Asian:	2,671	( 0.4% )
Pacific Islander:	104	( 0.0% )
Mixed Race:	3,673	( 0.6% )
Other:	242	( 0.0% )

Transmitter Information:

Call Letters: KTVE-DT FCC Table of Allotments

File Number:

Latitude: 33-04-41 N

Longitude: 092-13-41 W

ERP: 734.00 kW

Channel: 27

Frequency: 551.0 MHz

AMSL Height: 635.92 m

Elevation: 43.0 m

HAAT: 605.0 m

Horiz. Antenna Pattern: Omni

Vert. Elevation Pattern: Yes

Electrical Beam Tilt: 0.5

Propagation Model: Longley/Rice

Climate: Continental temperate

Conductivity: 0.0050

Dielectric Constant: 15.0

Refractivity: 100.0

Receiver Gain: 0 dB

Time Variability: 90.0%

Situation Variability: 50.0%

ITM Mode: Broadcast

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Population report for KTVE-DT FCC Table . Field strength above 41.00 db  
uV/m.

Total Population: 631,427

Total Housing Units: 270,805

Total Area covered by KTVE-DT FCC Table: 41299.49 sq. km

Total Area covered by KTVE-DT FCC Table where population exists: 21486.48  
sq. km

Breakdown:

White:	380,922	( 60.3% )
Black:	233,581	( 37.0% )
Hispanic:	8,924	( 1.4% )
Native American:	1,295	( 0.2% )
Asian:	2,678	( 0.4% )
Pacific Islander:	104	( 0.0% )
Mixed Race:	3,680	( 0.6% )
Other:	243	( 0.0% )